

**THE LAW  
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July 9, 2024

**VIA ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 701  
New York, New York 10007

**Re: United States v. Michael Shvartsman, et. al., No. 23 Cr. 307 (LJL)**

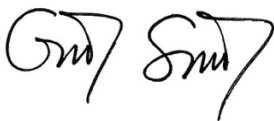
Dear Judge Liman:

On behalf of Michael Shvartsman, defendant in the above-referenced case, I write to request that the Court modify the travel restrictions imposed on the defendant as a condition of his bail, as indicated below. I have communicated in writing with Assistant United States Attorney Matthew Shahabian, and Mr. Shahabian advised that the Government does not have an objection to this application. Additionally, the supervising officer in the U.S. Probation Office, Southern District of Florida, has no objection

My client requests to travel to Jackson Hole, Wyoming for a family trip on July 18, 2024, through July 24, 2024. We have committed to provide the U.S. Attorney's office and pretrial services detailed travel plans upon this request being approved by the Court.

As I have noted above, AUSA Shahabian and the SDFL Probation Office have no objection to this application, and if the Court is inclined to grant it, we request it do so by endorsing this letter with an endorsement above.

Very truly yours,

Handwritten signature of Grant J. Smith in black ink.

Grant J. Smith  
Counsel to Michael Shvartsman

cc: All counsel of record via ECF